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Internet Corporation for Assigned Name and Numbers  
International Square  
1875 I Street, NW, Suite 501  
Washington D.C., 20006

Via Electronic Mail to [policy-staff@icann.org](mailto:policy-staff@icann.org)

Attention: Kurt Pritz

Re: International Business Machines response to New gTLD Program: Aspects of an Expressions of Interest and Pre-Registration Model, dated 18 December 2009

International Business Machines (IBM) appreciates the opportunity to comment on the New gTLD Program: Aspects of an Expressions of Interest and Pre-Registration Model, dated 18 December 2009. IBM appreciates the measures taken by the Internet Corporation for the Assigned Names and Numbers (ICANN) on responding to public concerns and establishing transparency and openness in the application process for the new Generic Top Level Domain (GTLTD) program through the current proposal, and more generally through the three (3) Draft Applicant Guidebooks (DAGs). IBM looks forward to publication of the fourth Draft Applicant Guidebook.

Brands play a vital role in the global economy. International protection of a brand is an essential part of any brand owner investment in a brand, but especially internationally recognized brands. The IBM brand is a vital asset in the IBM intellectual property portfolio. IBM encourages ICANN to continue with their spirit of openness and transparency with implementation of the new gTLD program.

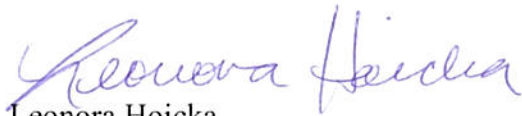
IBM has limited our response to the following general comment.

### **Response on Expression of Interest Applications**

IBM does not support the proposition that ICANN open the first round of new generic Top Level Domains (gTLDs) through the use of an Expression of Interest (EI) application. The new gTLD program should only open after a complete evaluation and response to all concerns.

IBM recommends that ICANN instead focus on the fourth DAG, accumulation of comments and an ICANN response thereto, and ultimate development of a final DAG. Submission of any public comment is a demonstration of interest in the new gTLD program. The content of the comments will help ICANN acquire the proverbial “temperature” of the public on the new gTLD program and facilitate an address of any public concerns.

Respectfully submitted,



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